

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE NEW YORK CITY DISTRICT COUNCIL OF  
CARPENTERS PENSION FUND, NEW YORK CITY  
DISTRICT COUNCIL OF CARPENTERS WELFARE  
FUND, NEW YORK CITY DISTRICT COUNCIL OF  
CARPENTERS VACATION FUND, NEW YORK CITY  
DISTRICT COUNCIL OF CARPENTERS ANNUITY  
FUND, NEW YORK CITY DISTRICT COUNCIL  
OF CARPENTERS APPRENTICESHIP, JOURNEYMAN  
RETRAINING, EDUCATIONAL AND INDUSTRY  
FUND, NEW YORK CITY DISTRICT COUNCIL OF  
CARPENTERS CHARITY FUND, and THE NEW YORK  
CITY AND VICINITY CARPENTERS LABOR-  
MANAGEMENT COOPERATION FUND,  
by MICHAEL J. FORDE and PAUL O'BRIEN,  
as TRUSTEES, and MICHAEL J. FORDE, as EXECUTIVE  
SECRETARY-TREASURER, DISTRICT COUNCIL FOR  
NEW YORK CITY AND VICINITY, UNITED  
BROTHERHOOD OF CARPENTERS AND JOINERS  
OF AMERICA,

08 CV 2944 (WHP)  
ECF CASE

**NOTICE OF MOTION**

Plaintiffs,

-against-

NEW YORK CONCRETE WORKS INC.,

Defendant.

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C O U N S E L :

PLEASE TAKE NOTICE, that upon the annexed affidavit of Andrew Grabois, Esq.  
sworn to on May 7, 2008, the stipulated facts and exhibits annexed thereto, and upon all  
pleadings and proceedings heretofore and herein, the undersigned, on behalf of the plaintiffs, will  
move this Court before the Honorable William H. Pauley, United States District Court Judge at  
the United States Courthouse, Southern District of New York, located at 500 Pearl Street,  
Courtroom 11-D, New York, New York 10007, at a date and time to be set by the Court, for an  
Order granting plaintiffs' motion for default judgment, and for such other and further relief as the  
Court deems proper and just.

Dated: New York, New York  
May 7, 2008

Yours, etc.,

O'DWYER & BERNSTIEN, LLP

By:



ANDREW GRABOIS, ESQ.

Attorney for Plaintiffs

52 Duane Street, 5th Floor

New York, New York 10007

(212) 571-7100

TO: New York Concrete Works Inc.  
420 Clark Avenue  
Staten Island, NY 10306